

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE
MEMPHIS DIVISION

JUST CITY, INC., et al.,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	
)	Civil Action No. 2:24-cv-2540-TLP-tmp
FLOYD BONNER, JR., et al.,)	
)	Judge Parker
<i>Defendants,</i>)	Magistrate Judge Pham
)	
and)	
)	
STATE OF TENNESSEE,)	
)	
<i>Intervenor.</i>)	
)	

STATE OF TENNESSEE’S NOTICE OF EXPANDED INTERVENTION

The State of Tennessee, by and through the Office of the Tennessee Attorney General, intervened in this matter pursuant to 28 U.S.C. § 2403(b) and Fed. R. Civ. P. 5.1 for the limited purpose of defending the constitutionality of the 2024 amendment to Tenn. Code Ann. § 40-11-118(b)(2). *See* Order, ECF No. 40. Plaintiff alleged in its original complaint that the 2024 amendment violates the Due Process Clause and Equal Protection Clause of the Fourteenth Amendment based on “fundamentally unfair procedures” and “discriminatory wealth-based detention.” (Complaint, ECF No. 1, PageID## 12-13.) On March 6, 2025, the Court granted Plaintiff leave to file an amended complaint, which includes a new claim under the Due Process Clause of the Fourteenth Amendment that the challenged statute is void for vagueness. *See* First Amended Class Action Complaint (ECF 75-2) at PageID# 756; Text Order (ECF 77).

Accordingly, the State respectfully gives notice of its intent to expand the scope of its Rule 5.1 intervention and defend the constitutionality of the 2024 amendment to § 40-11-118(b)(2)

against the claims alleged in the amended complaint, including the newly added vagueness claim. The State reiterates that it will not be participating in discovery or other matters in this case unrelated to the defense of the constitutionality of Tennessee law.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on March 10, 2025, the foregoing document was filed through the Court's ECF/PACER system, which served notice of filing on the following counsel of record:

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